



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
AIR, NOISE, AND RADIATION

MEMORANDUM

SUBJECT: Source Specific SIP Revisions

FROM: Sheldon Meyers, Director /S/
Office of Air Quality Planning and Standards (ANR-443)

TO: Director, Air and Waste Management Division
Regions II-IV, VI-VIII, X
Director, Air Management Division, Regions I, V, IX

We have recently noticed a significant increase in the number of source specific SIP revisions being processed. While no single reason can explain the increase entirely, it appears that the improved ability of Regions to process such actions as well as the passage of compliance dates has led to the increase. It is imperative that Regions determine whether SIP revisions are the appropriate administrative mechanism to deal with these actions and that these submittals be adequately supported. In this regard I am making the following recommendations:

° Many of these submittals consist of relaxations for individual sources in nonattainment areas. Presumably, the States want not only EPA approval of these relaxations, but also maintenance of the overall approval status of their SIP's. Hence, they are not asking for EPA to approve the relaxations if that would mean that the construction ban would come into or continue in effect. For a State to secure EPA approval of a relaxation and continue overall approval status, however, the State would need to show that the SIP as a whole, despite the relaxation, would continue to "provide for" attainment by the end of 1982 in the case of nonextension areas or as expeditiously as practicable, but no later than 1987 in extension areas. For VOC this generally will require a data base and modeling demonstration consistent with that applied in extension areas. For TSP and SO₂, this will require a modeling demonstration using reference modeling techniques and best available data. I recommend that the Regions return to the States as incomplete any submittal that does not include the above demonstration.

° Each Region that is currently experiencing an increase in the number of source specific SIP revisions for areas in attainment, or where the attainment date has not passed, should discuss with its States whether individual SIP revisions are the most appropriate means to deal with an action. Where alternative administrative mechanisms exist or can be developed without adversely impacting the Federal enforceability of the SIP, these mechanisms should be employed. For example, Regions could negotiate with States to bundle source specific revisions into a more comprehensive submittal rather than submit a number of individual actions.

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• Where the State is considering submitting a revision of a temporary nature, such as a compliance date extension for a limited period of time (e.g., less than the time it would reasonably take to process the submittal), Regions should evaluate whether processing the action will serve any tangible public interest. Where the Region does not find any such circumstances exist, States should be discouraged from using the SIP process for such actions.

I believe these recommendations should help you in your review of future SIP revisions and help Regions maintain the excellent record for SIP processing. If you have any questions regarding these recommendations, please contact G. T. Helms at FTS 629-5526 or ~~John Rasnic at FTS 382-2826.~~

cc: Air Branch Chief, Regions I-X
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